

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

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JOHAN A. VAN WEELDEN,

Plaintiff,

vs.

EQUAL ENERGY LTD., DON KLAPKO,  
MICHAEL DOYLE, VICTOR DUSIK,  
ROBERT WILKINSON, KYLE TRAVIS,  
LEE CANAAN, MICHAEL COFFMAN,  
PETROFLOW CANADA ACQUISITION  
CORP., and PETROFLOW ENERGY  
CORPORATION,

Defendants.

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ANTHONY MONTEMARANO,  
Individually and on Behalf of All Other  
Persons Similarly Situated,

Plaintiff,

vs.

EQUAL ENERGY LTD., MICHAEL  
DOYLE, LEE CANAAN, MICHAEL  
COFFMAN, VICTOR DUSIK, DON  
KLAPKO, KYLE TRAVIS, ROBERT  
WILKINSON, PETROFLOW ENERGY  
CORPORATION, and PETROFLOW  
CANADA ACQUISITION CORP.,

Defendants.

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Civil Action No. 5:14-cv-00047-C

Civil Action No. 5:14-cv-00058-C

**CLASS ACTION**

[Additional Captions Follow]

**GARRY MITINAS' MOTION FOR (1) CONSOLIDATION, (2) APPOINTMENT  
AS LEAD PLAINTIFF, AND (3) APPROVAL OF LEAD COUNSEL**

ANDREW COOKE, ON BEHALF OF  
THE ANDREW R. COOKE 1998 TRUST,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.

EQUAL ENERGY LTD., PETROFLOW  
ENERGY CORPORATION,  
PETROFLOW CANADA ACQUISITION  
CORP., MICHAEL DOYLE, DON  
KLAPKO, LEE CANAAN, MICHAEL  
COFFMAN, VICTOR DUSIK, KYLE  
TRAVIS, and ROBERT WILKINSON,

Defendants.

Civil Action No. 5:14-cv-00087-C

**CLASS ACTION**

JONATHAN SCRIPTURE, on Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

vs.

EQUAL ENERGY LTD., DON KLAPKO,  
MICHAEL DOYLE, VICTOR DUSIK,  
ROBERT WILKINSON, LEE CANAAN,  
MICHAEL COFFMAN, KYLE TRAVIS,  
PETROFLOW ENERGY  
CORPORATION, and PETROFLOW  
CANADA ACQUISITION CORP.,

Defendants.

Civil Action No. 5:14-cv-00114-C

**CLASS ACTION**

**PLEASE TAKE NOTICE** that on a date and time as may be set by the Court, at the United States District Court for Western District of Oklahoma, Gary Mitinas (“Mitinas”) will, and hereby does, move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order: (1) consolidating the above-captioned actions and any related actions that may be filed under Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing Mitinas as Lead Plaintiff in the above-captioned action; (3) approving Mitinas’ selection of Faruqi & Faruqi, LLP as Lead Counsel for the Class and Hartman, Blackstock & Moore as local counsel; and (4) granting such other and further relief as the Court may deem just and proper.

This motion is based on the accompanying Memorandum of Law in support thereof, the Declaration of Juan E. Monteverde filed herewith, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Mitinas respectfully requests the Court to: (1) consolidate the above-captioned actions and any related actions that may be filed; (2) appoint Mitinas as Lead Plaintiff pursuant to the PSLRA; (3) approve Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: March 31, 2014

Respectfully submitted,

s/ Jack C. Moore

**HARTMAN, BLACKSTOCK & MOORE**

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**FARUQI & FARUQI, LLP**

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*Attorney for Movant Gary Mitinas*

**Certificate of Service**

I hereby certify that on March 31, 2014, I electronically transmitted the foregoing pleading to the Clerk of Court using the ECF System for filing, and a copy thereof was electronically served upon all parties receiving notice pursuant to the CM/ECF system.

s/ Jack C. Moore